

wherein said central data store contains shared system resource data and is adapted to communicate at least a portion of the system resource data to the client application via said central data server over the communications link in response to resource data requests from the client application; and
an update communications server connected to said central data server, said update communications server being further connected to a resource source to provide a communications link between said central data server and the resource source.

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38. (Amended) A computer-readable medium having computer-executable instructions for performing steps comprising:

obtaining a copy of resource data from a source of resource data;
receiving data process requests from one or more client applications;
processing the resource data requests by sharing the copy of the resource data; and
communicating the processed resource data to the respective applications.

Remarks

A reconsideration of the present application is respectfully requested.

Claims 1, 18, 33 and 38 have been amended.

Claims 1-4, 6-8, 13-16, 18, 33-35, 37, 38-41, 43-45 and 50-54 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Atsushi Kanamori, U.S. Patent No. 5,754,854.

In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed, and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686, 688, 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc v. Montefiore Hospital*, 732 F. 2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir 1984).

Kanamori does not provide all of the elements of the claimed invention as recited in amended claims 1, 18, 33 and 38. Furthermore, Kanamori neither teaches nor suggests the claims of the present invention.

The Examiner contends with respect to claim 33 that Kanamori teaches the central data store, the data service, a client application, system resource data and the update communications server of the applicant's invention. This contention is inaccurate because the components of the present invention are neither the same nor do they perform functions. In fact, the components of the present invention are quite distinct and opposed to the teachings of Kanamori. Further still, Kanamori does not provide all of the elements of applicant's invention as claimed.

The Examiner's attempt to equate components of applicant's invention with those of Kanamori fails to account for the fundamental difference in the premises of both systems. The basic premise of applicant's invention enables the sharing of resources without creating multiple copies of the same resource data. Kanamori is premised upon parallel multiple resources, column 2, line 61-67.

Transferee program 321 of Kanamori obtains access to an intended shared block of memory by having a copy of the memory block duplicated within the local

memory space of the transferee program, column 6, line 21-23. More specifically, Kanamori teaches "...providing a group of parallel resources as a proxy for a single shared resource." (column 2, lines 62-63). Kanamori further teaches providing one or more private memory blocks in place of a global memory block (column 2, lines 63-65), through copying of the content of the global memory to proxy memory blocks (column 4, lines 38-41).

Based on the foregoing, it can be seen that Kanamori neither teaches nor suggests applicant's invention. Even further, applicant's invention cannot be obvious in light of Kanamori because Kanamori actually teaches a way from the concept of applicant's invention. Applicant's invention is directed to single shared resources and minimizing the duplication of resource data.

The Examiner states that Kanamori teaches the central data store of applicant's invention. The Examiner contends that an equivalent component exists within Kanamori. However, central data store of applicant's invention is the repository for resource data. Central data store does not make copies of intended shared data within its memory space as does the 'equivalent' component of Kanamori. Instead, central data store utilizes a fast access array for relative addressing by clients to enable access to a single shared data. Kanamori neither teaches nor suggests any such feature or function.

Even further, the Examiner states that the central data server of applicant's invention is identical to the transferee program of Kanamori. This association is inaccurate because the central data server of applicant's invention does not function in the same manner as the transferee program nor in the same manner as any of the other components of Kanamori. In fact, nothing about the central data server as described or

claimed in Applicant's invention is suggested in Kanamori. In particular, central data server of applicant's invention acquires resource data from the central data store when requested by a client. The data is processed by an update server and not by the transferee as in Kanamori (col. 6, lines 33 to 37). Clients in the invention receive the processed data rather than copies of the requested resource data as in Kanamori. Even further, it would not have been obvious nor suggested by the teachings of Kanamori to process the data and send out the results because Kanamori teaches maintaining individual copies of requested resource data within the memory space of multiple transferees (col. 6, lines 33-37, col. 7, lines 48-52, lines 56-57). Applicant's invention features and provides constrained computer memory usage by not creating multiple copies of the same resource data. In other words, Kanamori teaches the duplication and paralleling of resource data as the paradigm for data sharing. This paradigm is inconsistent with applicant's invention. As such, Applicant's invention could not have been suggested from the teachings of Kanamori.

Claims 5, 17, 36 and 42 are rejected as being unpatentable over Kanamori in view of Jon Franklin Matousek, U.S. Patent No. 5,706,462. Kanamori and Matousek either alone or in combination do not provide all of the elements of the claimed invention as recited within the claims. Furthermore, there is no suggestion or motivation to combine Matousek with Kanamori. Even if the references could be combined, the mere fact that references can be combined does not render the resulting combination obvious, unless the prior art also suggests the desirability of the combination. In re Kotzab, 217 F.3d 1365, 1371, 55 USPQ2d 1313, 1318 (Fed. Cir. 2000). Matousek cannot be used as a reference combinable with Kanamori. In view of the amendment to claim 1, 18, 33 and

38 and the discussion regarding those claims, the dependent claims 5, 17, 36 and 42 do not have all of the claim limitations of Kanamori and Matousek alone or in combination. Since all of the claim limitations are not found in Kanamori and Matousek, the 35 U.S.C. 103(a) rejections are not proper. Accordingly, applicant's respectfully request the withdrawal of the rejection with respect to the claims.

Claims 9-12, 19-32 and 46-49 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kanamori and further in view of Vlad Bril, U.S. Patent No. 5,539,428. Bril is directed to a page mode access for video display to allow the simultaneous use of multiple fonts without slowing down a video controller. In order to rely on a reference under 35 U.S.C. 103, it must be analogous art. MPEP § 2141.01(a). Bril is not analogous art to Kanamori or Applicant's invention. Moreover, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures. *In re Geiger*, 815 F.2d 686, 688, 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc v. Montefiore Hospital*, 732 F. 2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir 1984).

Applicant's invention is in no way suggested by the mere act of font caching for alpha-numeric display as taught in Bril. Bril in combination with or separate from Kanamori does not teach or suggest providing cached font information back to individual applications or clients as a shared resource. Bril is directed to improving video controller and video display response time through caching and paginated access to the cached data. The font caching described in applicant's invention is but one of many shared resource functions that an application program performs. Prior to Applicant's invention such features would have required the duplication of cached information or not

be accessible to application programs to such resources. Accordingly and in light of the previous discussion with respect to Kanamori, Applicant's respectfully submit that Bril and Kanamori are not properly combinable and do not suggest nor teach applicant's claimed invention alone or in combination.

Bril is not analogous prior art to Applicant's invention because Bril is not in the field of Applicant's endeavor and it is not pertinent to the particular problem with which the inventors are concerned. *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Circ. 1992).

The refresh and update functions taught by Bril are directed to facilitating quicker video display response. Applicant's invention and Kanamori are directed to resource sharing. It would not have been obvious to combine Bril's different field of endeavor with Kanamori, which teaches away from the single shared resource scheme, to solve the problem addressed by Applicant's invention.

In light of the amendments to claims 1, 18, 33 and 38 and the argument above, Applicant's respectfully request the withdrawal of the 35 U.S.C. 103(a) rejection with respect to these claims. In further view of the allowability of claims 1, 18, 33 and 38, Applicant's submit that the claims which depend from them are also in condition for allowance.


In view of the foregoing, it is submitted that the present application is in a condition for allowance and such allowance is respectfully requested. Should any unresolved issues remain, please feel free to contact the undersigned at the phone number listed below.

Conclusion

As amended, claim 1, 18, 33 and 38 recite the utilization of a shared copy of resource data rather than duplicating the resource data. Further still, the amended claims recite the communication of processed resource data to applications, rather than just the requested data. Further, for the reasons set forth above, Kanamori does not teach or suggest the claims of the present invention; the combined teachings of Kanamori and Matousek, taken as a whole do not provide all of the elements of the claimed invention; Brill is not analogous art; Kanamori teaches away from a single shared resource and instead advocates multiple copies of resource data for parallel access. Accordingly, Applicant's respectfully request the withdrawal of the 35 U.S.C. 103(a) rejections with respect to claims 1-54.

No new claims have been added. It is Applicant's position that no new matter has been added and that there is sufficient disclosure within the present application to support the amended claims.

Respectfully submitted,



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Version With Markings to Show Changes Made

1. (Amended) A method in a computer system for sharing system resource data between two or more applications running as separate processes, said method comprising:

obtaining the resource data from a source of system resources and storing

a shared copy of the resource data to be utilized by the two or more applications;

receiving one or more resource data requests from the applications;

processing the resource data requests by accessing and utilizing the shared copy of the resource data; and

communicating the processed resource data ~~requests~~ to the respective applications.

18. (Amended) A method for sharing graphics device interface (GDI)/font resource data between multiple instances of single document interface (SDI) applications, said method comprising:

obtaining a copy of the GDI/font resource data to be shared with at least two of the SDI applications;

receiving font data process requests from the SDI applications;

processing the font data requests using the shared copy of the GDI/font resource data; and

communicating the processed font data ~~requests~~ to the SDI applications.

33. (Amended) A cross-process resource sharing system, said system comprising:

a central data server for acquiring and processing requested resource data;

a central data store containing shared resource data, wherein said central data server establishes a communications link between said central data store and a client application;

wherein said central data store contains shared system resource data and is adapted to communicate at least a portion of the system resource data to the client application over the communications link in response to resource data requests from the client application; and
an update communications server connected to said central data server, said update communications server being further connected to a resource source to provide a communications link between said central data server and the resource source.

38. (Amended) A computer-readable medium having computer-executable instructions for performing steps comprising:

obtaining a copy of resource data from a source of resource data;
receiving data process requests from one or more client applications;
processing the resource data requests by sharing the copy of the resource data; and
communicating the processed resource data ~~requests~~ to the respective applications.